

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SHEILA JARRETT
1147 Tyler Avenue
Annapolis, MD 21403

*

*

Plaintiff,

Civil Action No.:

v.

*

CL WATERGATE, LLC
c/o Castle Lanterra Properties
One Executive Boulevard
Suffern, NY 10901

*

*

Defendant.

*

*

* * * * *

NOTICE OF REMOVAL

COME NOW, Petitioner/Defendant, CL Watergate, LLC, by and through its undersigned attorneys, pursuant to 28 U.S.C. § 1441 *et. seq.*, files this Notice of Removal of this action from the Circuit Court for Anne Arundel County, Maryland, in which it is now pending, to the United States District Court for the District of Maryland, and in support thereof respectfully avers as follows:

1. Petitioner/Defendant, CL Watergate, LLC. have been named as a Defendant in a suit filed in the Circuit Court for Anne Arundel County, Case No.: C02CV22000113. Suit was originally filed on or about January 21, 2022. On or about March 3, 2022, CL Watergate, LLC, obtained notice of the instant litigation through its own efforts. Further, efforts to obtain information from Plaintiff's counsel concerning service on CL Watergate, LLC have been unsuccessful. Accordingly, CL Watergate, LLC, will rely on the February 18, 2022 date of filing regarding the Affidavit of Service obtained via the Maryland Case Search on-line database to move forward with seeking to remove the instant action.

2. CL Watergate, LLC is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business located in Suffern, New York.

3. Plaintiff, Sheila Jarrett is a resident of the state of Maryland.

4. The above-entitled action is one in which this Court has original jurisdiction pursuant to Title 28 U.S.C. §1332. Petitioner seeks to remove this action to this Court under Title 28 U.S.C. §1441.

5. Filed herewith as **Exhibit 1** is a copy of all pleadings and papers obtained by Petitioner/Defendant, CL Watergate, LLC consisting of (1) Plaintiff's Complaint.

6. Petitioner is entitled to removal because there exists complete diversity between Plaintiff, Sheila Jarrett, and Petitioner/Defendant, CL Watergate, LLC. Additionally, the amount in controversy exceeds \$75,000.00 because Plaintiff's Complaint seeks judgment against Petitioner/Defendant, CL Watergate, LLC "in an amount in excess of \$75,000.00, together with interest from the date of injury to Plaintiff; costs, expert witness fees and such other and further relief as this Honorable Court deems just and proper."

WHEREFORE, Petitioner/Defendant, CL Watergate, LLC respectfully requests that the above-entitled action be removed from the Circuit Court for Anne Arundel County, Maryland to the United States District Court for the District of Maryland.

Respectfully submitted,



G. Calvin Awkward, III, Esq. (Bar No.: 18652)

Goldberg Segalla, LLP

111 South Calvert Street, Suite 2000

Baltimore, MD 21202

Ph: (443) 615-7513

Fx: (443) 615-7599

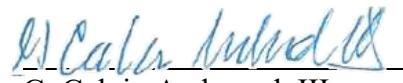
cawkward@goldbergsegalla.com

Counsel for Petitioner/Defendant, CL Watergate, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of March, 2022, a copy of the foregoing Notice of Removal was served via ECF and/or first class mail, postage pre-paid, to:

Mark Rosasco, Esquire
Hyatt & Weber, P.A.
200 Westgate Circle, Suite 500
Annapolis, MD 21401
mrosasco@hwlaw.com
Attorneys for Plaintiff, Sheila Garrett


G. Calvin Awkward, III